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8 DEPARTMENT OF STATE

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 UNITED STATES DEPARTMENT OF) CASE NO. 19-cv-04094-HSG
13 STATE,)
14 Plaintiff,)
15 v.)
16 BRUCE OWEN and ALEXANDRA OWEN,)
17 Defendants.)
18 _____)

18 Pursuant to Civil Local Rule 7-12, plaintiff United States Department of State (“Plaintiff”) and
19 defendants Bruce and Alexandra Owen (“Defendants”), by and through their undersigned counsel,
20 hereby STIPULATE and respectfully REQUEST as follows:

21 On October 6, 2020, the Court vacated the October 27, 2020 pretrial conference and November
22 9, 2020 trial dates in this action. ECF No. 66 (“Order”). The Court ordered that “all other filing
23 deadlines, including motions in limine and pretrial filings, remain in effect and based on the October 27
24 pretrial and November 9 trial dates.” *Id.* The Court also ordered the parties to “be prepared to try this
25 case promptly once circumstances related to the COVID-19 pandemic permit, and the Court will set a
26 trial in 2020 if at all possible.” *Id.*

27 Pursuant to the Order, the parties’ deadline to file motions in limine remained October 6, 2020,
28 and Plaintiff filed *Daubert* challenges to exclude Defendants’ expert witnesses. ECF Nos. 67, 68.

1 Defendants will file any opposition by October 13, 2020. Based on the now-vacated October 27, 2020
2 pretrial conference date, the parties' remaining pretrial filings will also be due on October 13, 2020.

3 The parties respectfully submit that it would serve the interests of judicial economy and help
4 conserve the parties' resources if the Court continued these remaining pretrial filings (except
5 Defendants' opposition to Plaintiff's *Daubert* challenges) by one week, from October 13, 2020 to
6 **October 20, 2020**, which will be after the Court hears the parties' cross-motions for summary judgment
7 on October 15, 2020. *See* ECF No. 58. The parties respectfully submit that this continuance will allow
8 them to benefit from any guidance provided by the Court during the summary judgment hearing
9 regarding what issues are left in the case, if any, as well as provide additional time for the parties to
10 complete all pretrial tasks and joint submissions to ensure there will be an effective and efficient
11 presentation of issues at trial. The parties respectfully submit that a one-week continuance of pretrial
12 filing dates will aid their preparation to try this case promptly as soon as circumstances related to the
13 COVID-19 pandemic permit.

14 SO STIPULATED.

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16 Respectfully submitted,

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18 DAVID L. ANDERSON
United States Attorney

19 Dated: October 7, 2020 By: /s/ Savith Iyengar
20 SAVITH IYENGAR
Assistant United States Attorney
21 Attorneys for Plaintiff

22 By: **/s/ Daniel Berko
DANIEL BERKO
23 Attorney for Defendants

24 ** Pursuant to Civ. L.R. 5-1(i)(3), the filer of the document
has obtained approval from this signatory.

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ORDER

IT IS HEREBY ORDERED that Defendants will file any opposition to Plaintiff's motions to exclude Defendants' expert witnesses, ECF Nos. 67, 68, by October 13, 2020. The deadline for the parties' remaining pretrial filings is continued from October 13, 2020 to October 20, 2020.

SO ORDERED.

Dated: 10/8/2020

